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11 Attorneys for Defendant
12 WELLS FARGO BANK, N.A. d/b/a
AMERICA'S SERVICING COMPANY
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14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION**

16 BERNARD J. RHATIGAN, JR and ERIN E.
RHATIGAN,

17 Plaintiffs,

18 vs.

19 EQUIFAX INFORMATION SERVICES,
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION, LLC;
21 and WELLS FARGO BANK, N.A. d/b/a
AMERICA'S SERVICING COMPANY,
22

23 Defendants.

Case No. 3:14-cv-01037-JST
Hon. Jon S. Tigar
Ctrm. 9

24 **JOINT STIPULATION AND [PROPOSED]
ORDER RE COURT ISSUED
DEPOSITION SUBPOENAS**

Action Filed: August 16, 2013
Trial Date: June 1, 2015

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1 IT IS HEREBY STIPULATED by and between Plaintiffs BERNARD J. RHATIGAN, JR
2 and ERIN E. RHATIGAN (“Plaintiffs”) and Defendant WELLS FARGO BANK, N.A. d/b/a
3 AMERICA’S SERVICING COMPANY (“Wells Fargo”) as follows:

4 1. Pursuant to 15 U.S.C. § 1681b(a)(1), Equifax, Inc., TransUnion LLC and Experian
5 Services Corporation contend that they require a Court issued Subpoena before they will produce
6 records which relate to the Plaintiffs.

7 2. Plaintiffs and Wells Fargo agree that it is in their mutual interest to obtain the records as
8 specified in Exhibits 1-3, attached hereto.

9 3. Therefore, Plaintiffs and Wells Fargo hereby stipulate and respectfully request that this
10 Court issue the Subpoenas for Records compelling production of the requested documents as set
11 forth in Exhibits 1-3, attached hereto.

12 AGREED AS TO FORM AND CONTENT:

13 DATED: October 22, 2014 CONSUMER LITIGATION ASSOCIATES, P.C.

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15 By: /s/ Matthew J. Erausquin
16 Matthew J. Erausquin, Esq.
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18 Attorneys for Plaintiffs Bernard J. Rhatigan, Jr. and Erin
19 E. Rhatigan

20 DATED: October 22, 2014 SEVERSON & WERSON
21 A Professional Corporation

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23 By: /s/ David A. Berkley
24 David A. Berkley
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26 Attorneys for Defendant WELLS FARGO BANK, N.A.
27 d/b/a AMERICA’S SERVICING COMPANY

28 I, David A. Berkley, am the ECF user whose identification and password are being used to
file this Stipulation. I hereby attest that Matthew Erausquin has concurred in this filing.

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28 /s/ David A. Berkley
David A. Berkley

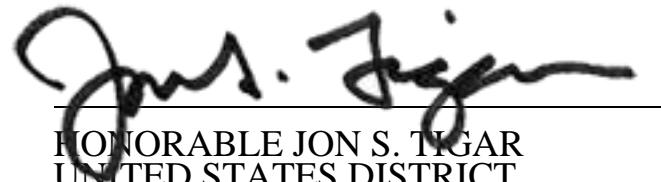
1 **[PROPOSED] ORDER**

2 The Court, having considered the Joint Stipulation for Court-Issued Deposition Subpoenas
3 ("Stipulation"), and good cause existing because, in the absence of another permissible purpose,
4 credit reporting agencies may only furnish consumer reports in response to the "order of a court"
5 (15 U.S.C. §1681b(a)(1)), hereby:

6 **ORDERS:**

7 Consumer reporting agencies Experian, Trans Union, and Equifax, are commanded to
8 produce to Wells Fargo, and permit inspection or copying of, the documents and
9 electronically stored information or objects contained in the subpoenas attached as
 Exhibits 1-3 to the Stipulation.

10 DATED: October 24, 2014



11 HONORABLE JON S. TIGAR
12 UNITED STATES DISTRICT
13 COURT JUDGE

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